

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**NOTICE OF RECLAMATION DEMAND OF ROUNDTRIPPING LTD.**

**PLEASE TAKE NOTICE** that by and through its undersigned counsel at Gibbons P.C., Roundtripping Ltd. (“**Roundtripping**”) hereby files this notice of the delivery of written demand for reclamation of goods pursuant to 11 U.S.C. § 546(c), upon Big Lots Stores, LLC, as successor in interest to Big Lots Stores, Inc., and its affiliated debtors (collectively, the “**Debtors**”) and Debtors’ counsel, to reclaim certain assets (the “**Goods**”) that are subject to reclamation. The Goods were manufactured and sold to the Big Lots Stores, LLC, as successor in interest to Big Lots Stores, Inc., in the ordinary course of Roundtripping’s business and delivered to and received by the Debtors during the forty-five (45) day period prior to the filing of the above-captioned chapter 11 cases while the Debtors were insolvent. Roundtripping attaches as **EXHIBIT A** and incorporates herein by reference a copy of its formal reclamation demand dated September 13, 2024.

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

**PLEASE TAKE FURTHER NOTICE** that as part of its demand for reclamation, Roundtripping is demanding that the Goods be segregated, identified, and not be commingled with any other goods.

**PLEASE TAKE NOTICE** that Roundtripping reserves all of its rights and remedies under Title 11 of the United States Code (as amended, the “**Bankruptcy Code**”), the Uniform Commercial Code, and any other applicable law, including the right to amend and/or supplement this Notice and to maintain that Roundtripping has title to the Goods. Nothing herein shall be deemed or constitute a waiver of, and Roundtripping expressly reserves any and all rights, claims, remedies, interest, and defenses, whether at law or in equity, including but not limited to Roundtripping’s right to an allowed administrative expense claim under section 503(b)(9) of the Bankruptcy Code or under any other applicable federal or state law.

Dated: September 13, 2024  
Wilmington, DE

/s/ Katharina Earle  
Katharina Earle (DE Bar No. 6348)  
**GIBBONS P.C.**  
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-and-

Mark B. Conlan  
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*Counsel to Roundtripping Ltd.*

## **EXHIBIT A**



Mark Conlan  
Director

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mconlan@gibbonslaw.com

September 13, 2024

Jonathan Ramsden  
Chief Financial and Administrative Officer  
**BIG LOTS, INC.**  
4900 E. Dublin-Granville Road  
Columbus, OH 43081

*With a copy via e-mail to:*

**DAVIS POLK & WARDWELL LLP**

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**Re: In re Big Lots, Inc., et al.**  
**Case No. 24-11967 (JKS)**

Dear Mr. Ramsden:

Gibbons P.C. is counsel to Roundtripping Ltd. ("**Roundtripping**") in connection with the above-referenced chapter 11 cases. As you know, on September 9, 2024 (the "**Petition Date**"), Big Lots, Inc. and its affiliates (the "**Debtors**") each filed voluntary petitions for relief under chapter 11, title 11, United States Code, 11 U.S.C. §§ 101-1532 (the "**Bankruptcy Code**") in the United States Bankruptcy Court for the District of Delaware.

Roundtripping provided the Debtors with holiday goods produced overseas pursuant to various purchase orders. The goods were manufactured by Roundtripping and delivered to the Debtors in the ordinary course of business of Roundtripping and received by the Debtors within 45 days of the Petition Date (the "**Reclamation Period**"), while the Debtors were insolvent. The goods include all of the goods delivered on or after July 26, 2024 and before the Petition Date, including, without limitation, the deliveries listed in the summary chart attached hereto and incorporated by reference herein. Upon information and belief, the goods have been received by the Debtors but not paid for by the Debtors.

GIBBONS P.C.

September 13, 2024

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Demand is hereby made upon the Debtors pursuant to Section 2-702 of the Uniform Commercial Code, as codified by applicable state law, and Section 546(c) of the Bankruptcy Code, for the return of the goods received by any and all of the Debtors during the Reclamation Period and that any of the goods and all other products delivered to the Debtors under additional contracts or purchase orders be segregated, identified and not sold, dissipated or commingled with any other goods. This reclamation demand is made without waiving any other rights, remedies or claims Roundtripping has against the Debtors.

Please promptly confirm whether the Debtors will honor this reclamation demand and advise when and where Roundtripping may arrange for the immediate return of the Goods.

Both Roundtripping and its undersigned counsel are also cognizant of the automatic stay provisions of Section 362 of the Bankruptcy Code. No action will be taken by or on behalf of Roundtripping to repossess the goods, without first obtaining relief from the automatic stay. The purpose of this letter is to perfect and preserve Roundtripping's rights under Section 2-702 of the Uniform Commercial Code, Section 546(c) of the Bankruptcy Code and other applicable federal or state law.

Nothing contained herein shall constitute a waiver of, and Roundtripping expressly reserves, any and all rights, claims, remedies, interests and defenses, whether at law or in equity, including but not limited to Roundtripping's right to an allowed administrative claim under Section 503(b)(9) of the Bankruptcy Code and all other rights under applicable federal or state law. Roundtripping reserves its right to amend or otherwise supplement this demand. Roundtripping notes that additional goods may have been received by the Debtors after the Petition Date.

Additionally, Roundtripping estimates that it currently has goods valued in excess of \$3.5 million USD "on the water" and inbound to U.S. ports for delivery to the Debtors' distribution centers. Roundtripping looks forward to hearing from the Debtors with respect to their intentions with respect to those goods in transit.

Please contact me if you have any questions or issues related to the foregoing.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Conlan", with a long horizontal flourish extending to the right.

Mark Conlan  
Director

MC:

Cc: Katharina Earle  
Audree Wang

Category	INV#	PO#	CNTR	FCR	Actual Arrival Date (of vessel at port)	Cargo Release Date at Port (goods pass)	Arrival to DC (customer warehouse)	Reclamation Claim
Xmas	RT-240165	95184479	APHU4621086, TCLU3767530	CNS-SGN-2401587	7/28	7/29	8/9	\$ 100,605.22
Xmas	RT-240125	95181557	TRLU9482127	CNS-SGN-2401426	8/11	8/11	8/16	\$ 41,580.00
Xmas	RT-240126	95181560	KKTU7729316, TRLU9482127	CNS-SGN-2401425	8/11	8/11	8/16	\$ 33,480.00
Halloween	RT-240009	95108439	TEMU7686433 -	CNS-SZP-2400931	7/27	7/27	8/21	\$ 10,426.70
Halloween	RT-240087	95112281	TEMU7686433 -	CNS-SZP-2400932	7/27	7/27	8/21	\$ 5,446.80
Xmas	RT-240135	95183202	DFSU4395962, FCIU8704705	CNS-SGN-2401477	7/27	7/27	7/31 8/1	\$ 178,497.05
Xmas	RT-240152	95180674	APZU4762528	CNS-HPH-2400110	8/24	8/24	9/4	\$ 62,623.96
Xmas	RT-240149	95179959	CSLU1884188, CSLU5166050	CNS-HPH-2400121	8/11	8/11	8/14	\$ 105,088.18
Xmas	RT-240147	95179966	CAIU3845718, TLLU8208471	CNS-HPH-2400105	8/14	8/14	8/22 8/20	\$ 100,959.78
Xmas	RT-240130	95181565	MEDU6731622	CNS-SGN-2401576	8/3	8/3	8/14	\$ 24,480.00
Xmas	RT-240103	95209793	CMAU4962368, DRYU4078231	CNS-SZP-2401150	8/4	8/4	8/14	\$ 64,866.50
Xmas	RT-240171	95217993	APHU7359719, CAAU6232321, CMAU6431083, TCNU2948607, TGBU6561236, TLLU8805353	CNS-SZP-2401167	8/4	8/4	8/13 8/13 8/13 8/16 8/15	\$ 126,628.70
Xmas	RT-240171	95223591	APHU7359719, CAAU6232321, CMAU6431083, TCNU2948607, TGBU6561236, TLLU8805353	CNS-SZP-2401167	8/4	8/4	8/13 8/13 8/13 8/16 8/15	\$ 34,498.10



Category	INV#	PO#	CNTR	FCR	Actual Arrival Date (of vessel at port)	Cargo Release Date at Port (goods pass)	Arrival to DC (customer warehouse)	Reclamation Claim
Xmas	RT-240168	95223600	APZU4289014,	CNS-SZP-2401065	8/10	8/10	8/13	\$ 50,852.10
			APZU4579040,				8/13	
			APZU4622568,				8/14	
			APZU4636509,				8/14	
			APZU4736869,				8/14	
			CMAU8185590,				8/14	
			CMAU9071015,				8/14	
Xmas	RT-240107	95209801	CMAU9077728,	CNS-SZP-2401151	8/4	8/4	8/14	\$ 29,105.30
			FSCU4754271				8/15	
Xmas	RT-240170	95217998	TCKU6222963	CNS-SZP-2401152	8/8	8/8	9/3	\$ 113,243.50
			CAIU7299410,					
			GCXU5026227,					
			HDMU6717496,					
			HMMU6078602,					
Xmas	RT-240170	95223614	HMMU6240230,	CNS-SZP-2401152	8/8	8/8	9/3	\$ 29,326.70
			HMMU6254790					
			CAIU7299410,					
			GCXU5026227,					
			HDMU6717496,					
			HMMU6078602,					
			HMMU6240230,					
Halloween	RT-240006	95108440	HMMU6254790	CNS-SZP-2400933	8/29	8/29	9/3	\$ 12,802.70
			KOCU5025899 - CFS					
			KOCU5025899 - CFS					
			FFAU2669894 - CFS					
			TRHU5429595 - CFS					
Xmas	RT-240177	95232461	KOCU5028671 - CFS	CNS-SZP-2401134	8/7	8/7	8/30	\$ 1,958.80
			MAGU5641470,					
Xmas	RT-240183	95218028	OOLU7873483	CNS-SZP-2401382	8/19	8/19	9/4	\$ 25,593.60
			MAGU5641470,					
Xmas	RT-240183	95232466	OOLU7873483	CNS-SZP-2401382	8/19	8/19	9/4	\$ 14,710.80
			MAGU5641470,					
Xmas	RT-240183	95248100	OOLU7873483	CNS-SZP-2401382	8/19	8/19	9/5	\$ 40,983.60
			MAGU5641470,					



Category	INV#	PO#	CNTR	FCR	Actual Arrival Date (of vessel at port)	Cargo Release Date at Port (goods pass)	Arrival to DC (customer warehouse)	Reclamation Claim
Halloween	RT-240007	95108437	NYKU4638590 - CFS	CNS-SZP-2400936	8/19	8/19	8/21	\$ 13,420.00
Xmas	RT-240099	95209797	DRYU4098080,	CNS-SZP-2401234	8/7	8/7	9/3	\$ 121,783.10
			SELJ4149164,				9/2	
			TGHU5070456,				8/30	
			TGHU5145658				8/30	
Xmas	RT-240104	95209802	APZU4473973,	CNS-SZP-2401235	8/7	8/7	8/30	\$ 113,834.20
			APZU4747626,				8/30	
			CMAU8256267,				8/30	
			CMAU8297332				9/4	
Xmas	RT-240173	95232462	SELJ4144619 - CFS	CNS-SZP-2401135	8/27	8/27	8/30	\$ 10,124.40
Halloween	RT-240080	95111461	ONEU0827063 - CFS	CNS-SZP-2400974	8/24	8/24	8/27	\$ 2,332.80
Xmas	RT-240150	95179965	OOLU4378995	CNS-HPH-2400157	8/24	8/24	9/5	\$ 54,551.10
Xmas	RT-240155	95180673	OOLU9309699	CNS-HPH-2400156	8/24	8/24	9/5	\$ 35,894.60
Xmas	RT-240156	95179967	CSNU7058494	CNS-HPH-2400164	8/31	8/31	9/1	\$ 42,955.36
Xmas	RT-243606	95232463	GESU6243403 - CFS	CNS-SZP-2401701	9/5	9/5	9/8	\$ 6,120.00

**Total Roundtripping Reclamation Demand**      \$      **2,746,532.96**